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 12 Administration in its capacity as Receiver for Rocket  
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17 Attorney for Defendants  
 18 Fred Cucchi, Alberto Gandini, Michele Liberato, Valor Life  
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 19 Claude Guez, Michael Roujansky, Michel Saunier, Patrice  
 Vinet, Nigel Backwith, Ajmair Singh Bhullar, Peter Ayrton  
 20 Cheese, The Reverend Canon Joseph Hawes and Mr.  
 Christopher Eyden, Alan John Healey, Justine Lumb,  
 21 Gregory Charles Meekings, Andrew Middleton

22 UNITED STATES DISTRICT COURT  
 23 NORTHERN DISTRICT OF CALIFORNIA  
 24 SAN FRANCISCO DIVISION

25 United States Small Business Administration in  
 26 its capacity as Receiver for Rocket Ventures II  
 SBIC, L.P.,

Case No.: CV-10-4425 JSW

27 Plaintiff,

28 **CAPTION CONTINUED ON NEXT PAGE**

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Stipulation for Additional Thirty Days to Respond to Amended Complaint

SCHNADER HARRISON SEGAL & LEWIS LLP  
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1 vs.

2 Rocket Ventures II, L.P., a California limited  
 3 partnership; Rocket Ventures II CEO Fund, L.P.,  
 4 a California limited partnership; Rocket  
 5 Ventures SBIC Partners, LLC, a Delaware  
 6 limited liability company; Cordusio Societa  
 7 Fiduciaria Per Azioni Lozia Federico; Kenneth  
 8 W.& Melissa Baldwin; Paul Cantwell; Peter  
 9 Ayrton Cheese; Yves Derville; Richard S.  
 10 Cuccioli; Alistair Anderson Donald; Philippe  
 11 Gire; Jean-Claude Guez; Joseph Hawes &  
 12 Chrisopher Eyden; Alan John Healey; Craig  
 13 Foster Heimark; David E. Kropp; Gregory  
 14 Charles Meekings; Michele Liberato; Fred  
 15 Cucchi; ValorLife; Alberto Gandini; Rijete Pty.  
 16 Ltd.; Christopher Stainton; Tyna Development;  
 17 Thomas Tynan; Patrice Vinet; Hahei Limited;  
 18 Michel Saunier; Michel Roujansky; Nigel  
 19 Backwith; Justine Lumb; Andrew Middleton;  
 20 Ajmair Singh Bhullar; Estate of Grant A. Dove;  
 21 Luca Casiraghi; David Mather,

22 Defendants.

Case No.: CV-10-4425 JSW

**STIPULATION BETWEEN PLAINTIFF  
 RECEIVER AND DEFENDANTS FRED  
 CUCCHI, ALBERTO GANDINI,  
 MICHELE LIBERATO, VALOR LIFE  
 (VADUZ/LICHTENSTEIN), YVES  
 DERVILLE, PHILIPPE GIRE, JEAN-  
 CLAUDE GUEZ, MICHAEL  
 ROUJANSKY, MICHEL SAUNIER,  
 PATRICE VINET, NIGEL BACKWITH,  
 AJMAIR SINGH BHULLAR, PETER  
 AYRTON CHEESE, THE REVEREND  
 CANON JOSEPH HAWES AND MR.  
 CHRISTOPHER EYDEN, ALAN JOHN  
 HEALEY, JUSTINE LUMB, GREGORY  
 CHARLES MEEKINGS, ANDREW  
 MIDDLETON FOR ADDITIONAL  
 THIRTY DAYS TO RESPOND TO  
 AMENDED COMPLAINT;  
 [PROPOSED] ORDER**

23 Plaintiff United States Small Business Administration in its capacity as Receiver for  
 24 Rocket Ventures II SBIC, L.P., ("Plaintiff Receiver") and newly added Defendants Fred Cucchi,  
 25 Alberto Gandini, Michele Liberato, Valor Life (Vaduz/Lichtenstein), Yves Derville, Philippe  
 26 Gire, Jean-Claude Guez, Michael Roujansky, Michel Saunier, Patrice Vinet, Nigel Backwith,  
 27 Ajmair Singh Bhullar, Peter Ayrton Cheese, The Reverend Canon Joseph Hawes and Mr.  
 28 Christopher Eyden, Alan John Healey, Justine Lumb, Gregory Charles Meekings, Andrew  
 Middleton, (the "Newly Named European Defendants")<sup>1</sup>, by and through their respective counsel  
 of record, hereby stipulate and agree as follows:

**WHEREAS,**

Plaintiff Receiver filed an Amended Complaint on January 18, 2012;

<sup>1</sup> By filing an Appearance and entering this Stipulation, the Newly Named European Defendants do not waive any potential objections to personal jurisdiction or service of process.

1 The time previously set for newly named parties to respond to the Amended Complaint  
2 has been ordered to be on or before March 21, 2012;

3 The parties are currently involved in settlement discussions to resolve the claims against  
4 the Newly Named European Defendants;

5 **NOW, THEREFORE,**

6 The Plaintiff Receiver and the Newly Named European Defendants hereby agree that the  
7 time for the Newly Named European Defendants to respond to the Amended Complaint shall be  
8 extended twenty-two days and the Newly Named European Defendants shall have up to, and  
9 including, April 12, 2012 to answer, move, or otherwise respond to the Amended Complaint.

10 **IT IS SO STIPULATED:**

11  
12 Dated: March 21, 2012

SCHNADER HARRISON SEGAL & LEWIS LLP

13  
14 By: /s/ Gregory C. Nuti

15 Gregory C. Nuti  
16 Attorneys for Plaintiff  
17 United States Small Business  
Administration in Its Capacity as Receiver  
for Rocket Ventures II SBIC, L.P.

18 *Pursuant to General Order No. 45 § X.B., the filer attests that concurrence*  
19 *in the filing of this document has been obtained from the above signatory.*

1 Dated: March 21, 2012

DEWEY & LEBOEUF LLP

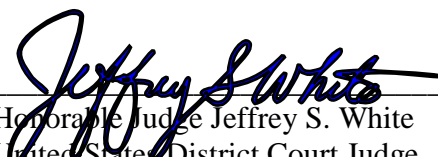
3 By: /s/ Diana Hughes  
4 Diana Hughes  
5 Attorney for Defendants

6 Fred Cucchi, Alberto Gandini, Michele  
7 Liberato, Valor Life (Vaduz/Lichtenstein),  
8 Yves Derville, Philippe Gire, Jean-Claude  
9 Guez, Michael Roujansky, Michel Saunier,  
10 Patrice Vinet, Nigel Backwith, Ajmair Singh  
11 Bhullar, Peter Ayrton Cheese, The Reverend  
12 Canon Joseph Hawes and Mr. Christopher  
13 Eyden, Alan John Healey, Justine Lumb,  
14 Gregory Charles Meekings, Andrew  
15 Middleton

13 **[PROPOSED] ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED:

16 Dated: March 22, 2012

17   
18 Honorable Judge Jeffrey S. White  
19 United States District Court Judge  
20 Northern District of California  
21  
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27  
28

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